

FILED  
HARRISBURG, PA

MAR 29 2024

## CIVIL COMPLAINT FORM TO BE USED BY A PRO SE PRISONER

PER [Signature]  
DEPUTY CLERKIN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIAVictor Blanco

Full Name of Plaintiff

Inmate Number

v.

Civil No. \_\_\_\_\_  
(to be filled in by the Clerk's Office)Warden Tzitutto

Name of Defendant 1

☒ Demand for Jury Trial☐ No Jury Trial DemandWarden Pigg

Name of Defendant 2

Jason Lando

Name of Defendant 3

Name of Defendant 4

Name of Defendant 5

(Print the names of all defendants. If the names of all  
defendants do not fit in this space, you may attach  
additional pages. Do not include addresses in this  
section).

## I. NATURE OF COMPLAINT

Indicate below the federal legal basis for your claim, if known.

- ☒ Civil Rights Action under 42 U.S.C. § 1983 (state, county, or municipal defendants)
- ☐ Civil Rights Action under Bivens v. Six Unknown Federal Narcotics Agents, 403 U.S. 388 (1971) (federal defendants)
- ☐ Negligence Action under the Federal Tort Claims Act (FTCA), 28 U.S.C. § 1346, against the United States

II. ADDRESSES AND INFORMATION

A. PLAINTIFF

Victor Bianco

Name (Last, First, MI)

Inmate Number

Lackawanna County Jail

Place of Confinement

1371 N. Washington Ave

Address

Scranton, PA 18509

City, County, State, Zip Code

Indicate whether you are a prisoner or other confined person as follows:

- ☒ Pretrial detainee  
☐ Civilly committed detainee  
☐ Immigration detainee  
☐ Convicted and sentenced state prisoner  
☒ Convicted and sentenced federal prisoner

B. DEFENDANT(S)

Provide the information below for each defendant. Attach additional pages if needed.

Make sure that the defendant(s) listed below are identical to those contained in the caption. If incorrect information is provided, it could result in the delay or prevention of service of the complaint.

Defendant 1:

Warden Tzintu

Name (Last, First)

Warden Lackawanna County Jail

Current Job Title

1371 N. Washington Ave

Current Work Address

Scranton, PA 18509

City, County, State, Zip Code

Defendant 2:

Warden Piggie

Name (Last, First)

Warden Leckawanna County Jail

Current Job Title

1371 N. Washington Ave

Current Work Address

Scranton, PA 18509

City, County, State, Zip Code

Defendant 3:

Jason Lando

Name (Last, First)

Grievance officer

Current Job Title

1371 N. Washington Ave

Current Work Address

Scranton, PA 18509

City, County, State, Zip Code

Defendant 4:

Name (Last, First)

Current Job Title

Current Work Address

City, County, State, Zip Code

Defendant 5:

Name (Last, First)

Current Job Title

Current Work Address

City, County, State, Zip Code

### III. STATEMENT OF FACTS

State only the facts of your claim below. Include all the facts you consider important. Attach additional pages if needed.

A. Describe where and when the events giving rise to your claim(s) arose.

Lackawanna county Jail violated my 1st, 4th, 8th, 14th amendment  
rights. By holding me in segregation indefinitely without due  
process

B. On what date did the events giving rise to your claim(s) occur?

2023 and 2024 at Lackawanna county Jail

C. What are the facts underlying your claim(s)? (For example: What happened to you?  
Who did what?)

Lackawanna county Jail is holding me in segregation indefin-  
itely without due process in violation of Koch-vs-Lewis  
216 F.Supp 2d 994 and Wolf-vs-McDonnell 418 U.S. 539 as well as  
Superintendent-vs-Hill 472 U.S. 445 because it must be some  
evidence in the record supporting a decision to segregate  
an inmate? It has been no disciplinary hearing held to support  
my segregation under Wolf 418 U.S. 539. Thus my 8th and 14th am-  
endment rights are being violated. My 1st amendment rights are  
also being violated under the Religious Freedom restoration  
act 42 U.S.C. § 2000bb-1 as well as the Religious land use and  
institutionalized persons act 42 U.S.C. § 2000cc-1

**IV. LEGAL CLAIM(S)**

You are not required to make legal argument or cite any cases or statutes. However, state what constitutional rights, statutes, or laws you believe were violated by the above actions. If you intend to assert multiple claims, number and set forth each claim in separate paragraphs. Attach additional pages if needed.

Warden Tzioukas, Warden Piggott, and Jason Londo was all put on notice with respects to my issues grievance #'s 42664-6271, 424879221, and 426005511 are all about being held in solitary confinement and I've been told that classification is not grievable? "see" exhibits A, B, and C... And Lackawanna County Policies and Procedures are not grievable? Thus, I've attempted all available administrative remedies. Grievance #425374231 is about my 1st amendment rights being violated "see" exhibit D: Every time I am held in Lackawanna County Prison I am denied my Religious Rights when I request Religious Ceremonies, meals etc. pertaining to my Religious Beliefs, when I ask for an explanation I never receive a reply "see" Exhibit D.

**V. INJURY**

Describe with specificity what injury, harm, or damages you suffered because of the events described above.

1st, 8th, 13th, and 14th amendment violations Judicial relief is still available wholly aside from any physical injury. *Canell vs. Lightner* 143 F.3d 1210 I've suffered mental and emotional injuries...

**VI. RELIEF**

State exactly what you want the court to do for you. For example, you may be seeking money damages, you may want the court to order a defendant to do something or stop doing something, or you may be seeking both types of relief. If you are seeking monetary relief, state your request generally. Do not request a specific amount of money.

\$250,000.55 Injunctive, Punitive, Compensatory, and nominal damages and relief as well as declaratory relief.

## VII. SIGNATURE

By signing this complaint, you represent to the court that the facts alleged are true to the best of your knowledge and are supported by evidence, that those facts show a violation of law, and that you are not filing this complaint to harass another person or for any other improper purpose.

Local Rule of Court 83.18 requires *pro se* plaintiffs to keep the court informed of their current address. If your address changes while your lawsuit is being litigated, you must immediately inform the court of the change in writing. By signing and submitting the complaint form, you agree to provide the Clerk's Office with any changes to your address where case-related papers may be served, and you acknowledge that your failure to keep a current address on file with the Clerk's Office may result in dismissal of your case.

Vietr Manuel Blanco

Signature of Plaintiff

3.25.2024

Date





Name: Victor Blanco #2024-00029  
Lackawanna County Prison  
1371 N Washington Avenue  
Scranton PA 18509-2840

**RECEIVED**  
HARRISBURG, PA

MAR 29 2024

PER [Signature]  
DEPUTY CLERK

Office of the Clerk  
United States District Court  
Sylvia H. Rambo United States Courthouse  
1501 North 6th Street, Suite 101  
Harrisburg, PA 17102

**CONTENTS MAILED FROM  
CORRECTIONAL FACILITY**

Lehigh Valley PENN PA 180  
THE 26 MAR 2024 PM

